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August 5, 2014

Via ECF and Hand Delivery

Hon. Mark Falk, U.S.M.J.
United States District Court
District of New Jersey
Frank R. Lautenberg U.S. Post Office
& Courthouse, Rm. 457
1 Federal Square
Newark, New Jersey 07102

Re: NXIVM Corporation, *et al.* v. Sutton, *et al.*
Docket No. 06-CV-1051

Dear Judge Falk:

This firm represents the Plaintiffs in the above-referenced matter. Please accept this letter in response to the instructions contained in Your Honor's July 29, 2014 letter to all counsel.

Plaintiffs still assert the following active claims in their Amended and Consolidated Complaint:

Count One – Misappropriation of Trade Secrets Against:

The Ross Institute
Rick Ross
Stephanie Franco
Paul Martin, Ph.D.
Wellspring Retreat, Inc.

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Count Three – Breach of Contract/Confidentiality Agreement Against:

Stephanie Franco

Count Four – Interference With Contractual Relations In Urging Breach of
Confidentiality Agreement Against :

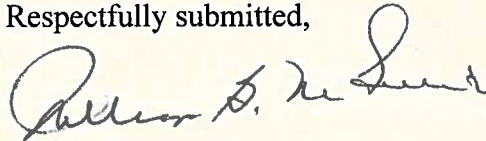
Estate of Morris Sutton
Rochelle Sutton
Rick Ross
The Ross Institute

Count Seven – Copyright Infringement Against:

Rick Ross
The Ross Institute
Paul Martin, Ph.D.
Wellspring Retreat, Inc.

We thank the Court for your consideration of this matter.

Respectfully submitted,



For William B. McGuire
TOMPKINS, McGUIRE, WACHENFELD & BARRY

cc: All Counsel (Via ECF)